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January 14, 2021

VIA ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888
luly.massaro@puc.ri.gov

**Re: Docket 5073 - Petition of Retail Energy Supply Association
for Implementation of Purchase of Receivables Program
RESA Response to DPUC Data Request – Set 1**

Dear Ms. Massaro,

Enclosed please find an electronic version of the Retail Energy Supply Association's response to the Division of Public Utilities and Carriers' First Set of Data Requests issued in the above-referenced matter.¹

Thank you for your attention to this filing. If you have any questions, please do not hesitate to contact me at 617-342-6884.

Very Truly Yours,

/s/ Ryan M. Murphy

Ryan M. Murphy

Enclosure

cc: Docket 5073 Service List

¹ Per Commission counsel's update on October 2, 2020 concerning the COVID-19 emergency period, RESA is submitting an electronic version of this filing. RESA will also provide the Commission Clerk with six (6) hard copies of the enclosures via First Class Mail.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below on January 14, 2021.

/s/ Ryan M. Murphy

Ryan M. Murphy, Esq.

**Docket No. 5073 – Retail Energy Supply Associations Petition for Implementation of Purchase of Receivables Program
Service List updated 1/5//2021**

Name/Address	E-mail Distribution	Phone
Retail Energy Supply Association; NRG Energy, Inc. Ryan M. Murphy, Esq. Eckert Seamans Cherin & Mellott, LLC Two International Place, 16 th Floor Boston, MA 02110	rmmurphy@eckertseamans.com ;	617-342-6884
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<p>Good Energy, Inc. James G. Rhodes, Esq. 25 Governor St. Providence, RI 02906</p>	<p>jamie.rhodes@goodenergy.com; philip.carr@goodenergy.com; stefano@goodenergy.com; patrick@goodenergy.com;</p>	<p>401-225-3441</p>
<p>File an original & 9 copies w/: Luly E. Massaro, Commission Clerk Cynthia Wilson-Frias, Counsel Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888</p>	<p>Luly.massaro@puc.ri.gov; Alan.nault@puc.ri.gov; Cynthia.WilsonFrias@puc.ri.gov; Todd.bianco@puc.ri.gov; John.harrington@puc.ri.gov; Rudolph.S.Falcone@puc.ri.gov;</p>	<p>401-780-2017</p>
<p>Office of Energy Resources Albert Vitali, Esq. Nicholas Ucci Christopher Kearns</p>	<p>Nicholas.ucci@energy.ri.gov; Christopher.Kearns@energy.ri.gov; Becca.Trietch@energy.ri.gov; Nathan.Cleveland@energy.ri.gov; Carrie.Gill@energy.ri.gov; Albert.vitali@doa.ri.gov</p>	

Retail Energy Supply Association
RIPUC Docket No. 5073
In Re: Retail Energy Supply Association (“RESA”)
Implementation of Purchase of Receivables (“POR”) Program
Responses to Division of Public Utilities and Carriers’ (“DPUC”)
First Set of Data Requests
Issued on December 24, 2020

DPUC 1-1

Request:

Reference page 6, lines 19-20.

- a. Please provide any supporting evidence behind the assertion that a POR program in Rhode Island would produce benefits consistent with experiences in other states.
- b. Have you quantified the potential benefit of a POR program in Rhode Island? If so, please provide the results along with all workpapers and analyses.

Response:

- a. Based upon my experience at Constellation Energy and in working with multiple other retail electric generation suppliers (“suppliers”) within RESA over the course of several years, I have observed a direct correlation between the implementation of a POR program and increased participation by suppliers in the competitive market. As I noted in my Direct Testimony, a POR program mitigates the risk that suppliers bear regarding nonpayment by their customers. By avoiding the need for suppliers to undertake costly credit screening and selective enrollment processes, a POR program reduces barriers to entering the market, thereby increasing the number of market participants and enhancing retail competition. This experience has been so universal across restructured states that have implemented a POR program that I have every reason to believe that it would produce similar benefits in Rhode Island. Suppliers face the same challenges in Rhode Island, particularly in trying to serve residential and small business customers, as they do in other restructured states. Therefore, this tool that has been successfully used in these other jurisdictions would be similarly effective in Rhode Island.

See Response to DPUC-1-2.

- b. No. However, at the same time, based upon the discovery response provided by National Grid on January 4, 2021 (RESA 2-1) regarding the administrative costs that it estimates incurring to implement a POR program, as revised on January 12, 2021, and the effect of those costs on the discounted rate for purchasing accounts receivables, RESA is confident that all of these costs can be recovered through the discount and that ratepayers will not incur any costs.

Prepared by and under the supervision of: Daniel W. Allegretti

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DPUC 1-2

Request:

Are you aware of any post implementation studies or analyses of POR in any of the states cited in your testimony (Massachusetts, Connecticut, Pennsylvania, New York, Connecticut, Delaware, Illinois, New Jersey, Ohio and Maryland)? If so, please provide those studies or analyses.

Response:

In a Report to the Governor and the Maryland General Assembly on the Status of Standard Offer Service dated December 31, 2018, the Maryland Public Service Commission credited implementation of the POR program in 2010 with playing a significant role in the increase in the number of residential customers served by suppliers. From 2008 to 2018, the number of residential choice customers increased by over 400% statewide in Maryland. The POR program appears to have been the only retail market enhancement implemented during that time that would have driven this increase in participation levels. The Report is available at this link: <https://www.psc.state.md.us/wp-content/uploads/Final-Competition-Report.pdf>.

While the experiences of other states were similar after implementing POR programs, it is difficult to determine how much impact the POR program on participation had because often other retail market enhancements were implemented during the same timeframe that increased shopping occurred. For instance, Pennsylvania also implemented a customer referral program, under which electric utilities inform customers calling in with non-emergency issues about their ability to select a supplier and receive a discounted supply rate and then refer interested customers to participating suppliers. This type of program has also had a positive impact on increasing the number of suppliers in the competitive market.

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DPUC 1-3

Request:

Reference page 9, lines 3-7. How would a POR program facilitate supplier participation in municipal aggregation?

Response:

Municipal aggregation is simply another sales channel for suppliers to use. A POR program would facilitate supplier participation in municipal aggregation in the same way that it would ease supplier entry into the competitive market through other channels.

See Response to DPUC-1-1.

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DPUC 1-4

Request:

Reference page 9, lines 10-16. Has RESA done an analysis to show what potential savings would be to RI customers? If so, please provide the analysis and any workpapers.

Response:

No, RESA has not done a specific analysis to show potential savings to RI customers. However, as RESA Exhibits DWA-2 and DWA-3 RESA has produced Market Savings Reports to show the potential for savings in the nearby restructured states of Connecticut and Massachusetts. These Reports also illustrate the innovative products that are available in these choice jurisdictions. These Reports demonstrate that customer can benefit from competition, and as I have noted, a POR program helps get suppliers participating in the market. The most recent version of the RESA Market Savings Report Summary, which shows potential savings for several states, was prepared in December 2020 and is attached as Attachment A.

In addition, in June 2020, RESA updated whitepapers and charts originally published in 2017 and 2018 by the late Dr. Phil O’Connor: *Restructuring Recharged: The Superior Performance of Competitive Electricity Markets 2008-2016* (April 2017) and *The Great Divergence in Competitive and Monopoly Electricity Price Trends* (September 2018). These materials, which also provide insights to explain why and how competition is producing economic benefits, can be accessed at this link: <https://www.resausa.org/phil-oconnor-thought-leadership>.

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DPUC 1-5

Request:

How would including the existing receivables in the program benefit Rhode Island customers?

Response:

Inclusion of the existing receivables in the POR program and not forcing the segregation of certain accounts, by both suppliers and the utility, into different operating systems would facilitate the transition to implementing this program. By simplifying the parameters under which the POR program is implemented in this way, the program’s success and associated benefits would be enhanced.

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DPUC 1-6

Request:

Reference page 7, lines 5-8, provide any studies or evidence that introducing POR programs “have increased the number of market participants and enhanced retail competition.”

Response:

While RESA cannot point to studies directly linking the introduction of POR programs to an increase in the number of market participants and enhanced retail competition, RESA notes that since POR programs have been implemented in restructured states, participation in competitive markets has grown significantly. For instance, a graph is attached as Attachment B, which shows the percentage of load switched in 14 restructured states from 2003 through 2019. The competitive market experienced significant growth from 2006-2012, which coincides with when POR programs were being implemented.

Also, in Pennsylvania, interim guidelines for POR programs were established in 2008 and the programs were implemented starting in 2009. According to statistics maintained by the Office of Consumer Advocate, only 128,914 residential customers were shopping for electric supply in October 2009. In January 2010, that number had risen to 337,600. The number of shopping residential customers continued to grow throughout 2010, with 461,606 in April 2010, 515,831 in July 2010, and 541,366 in October 2010. During 2011, this trend continued, with 582,097 residential customers shopping in January 2011, 827,757 in April 2011, 958,815 in July 2011, and 1,099,012 in October 2011. A rise in the number of shopping residential customers continued in 2012, when it reached 1,225,787 in January 2012, 1,349,481 in April 2012, 1,457,429 in July 2012, and 1,548,429 in October 2012. This trend continued into 2013 where in January 2013, 1,643,806 residential customers were shopping, in April 2013, 1,709,604 residential customers were shopping, and this number reached 1,737,497 in July 2013 and 1,778,883 in October 2013. The increase in the number of residential customers shopping continued in 2014, with 1,854,770 in January 2014. These statistics, along with others may be accessed at: <http://www.oca.state.pa.us/Industry/Electric/elecstats/instat.htm>. While all of this growth cannot necessarily be attributed to the POR programs, these statistics show that the number of residential customers participating in the competitive market grew exponentially following their implementation.

Prepared by and under the supervision of: Daniel W. Allegretti

DPUC 1-4
Attachment A

All Offers								Fixed Price Offers				Variable Price Offers			Green Offers		
Dec-20	Price to Compare "PTC" (\$/kWh)	Lowest Offer (\$/kWh)	Customer Savings (\$/kWh)	Potential Market Savings for the Month (Total \$)	# of Offers	Offers Below PTC	Recorded Date	# of Offers	Offers Below PTC	Longest Term (bill cycles)	Lowest Offer (\$/kWh)	# of Offers	Offers Below PTC	Lowest Offer (\$/kWh)	# of Offers	Offers Below PTC	Lowest Offer (\$/kWh)
MARKETS																	
Connecticut																	
Eversource - CL&P	\$0.07375	\$0.0717	\$0.00205	\$1,733,717	76	4	12/16/20	48	4	48	\$0.07170	N/A	N/A	N/A	28	0	\$0.07790
United Illuminating	\$0.08667	\$0.0747	\$0.01197	\$1,597,955	72	25	12/16/20	45	18	48	\$0.07470	N/A	N/A	N/A	27	7	\$0.07890
D.C.																	
Pepco DC (1)	\$0.07265	No Offers Provided			0	0		No Offers Provided				No Offers Provided			No Offers Provided		
Illinois																	
Ameren I - CIPS	\$0.04212	\$0.0410	\$0.00112	\$371,151	43	1	12/16/20	35	0	36	\$0.04600	2	0	\$0.07700	6	1	\$0.04100
Ameren II - CILCO	\$0.04236	\$0.0410	\$0.00136	\$231,292	39	1	12/16/20	32	0	36	\$0.04600	2	0	\$0.07700	5	1	\$0.04100
Ameren III - IP	\$0.04180	\$0.0410	\$0.00080	\$374,662	43	1	12/16/20	35	0	36	\$0.04600	2	0	\$0.07700	6	1	\$0.04100
ComEd	\$0.06567	\$0.0549	\$0.01077	\$23,977,353	86	6	12/16/20	62	5	36	\$0.05490	5	0	\$0.06577	19	1	\$0.05900
Massachusetts (2)																	
NSTAR BECO	\$0.09877	\$0.0941	\$0.00467		41	3	12/16/20	3	0	36	\$0.10290	20	2	\$0.09410	18	1	\$0.09610
NSTAR CAMB	\$0.09877	\$0.0941	\$0.00467	\$2,329,367	41	3	12/16/20	3	0	36	\$0.10290	20	2	\$0.09410	18	1	\$0.09610
NSTAR COMM	\$0.09877	\$0.0941	\$0.00467		41	3	12/16/20	3	0	36	\$0.10290	19	2	\$0.09410	19	1	\$0.09610
FGE	\$0.11400	\$0.0980	\$0.01600	\$206,853	11	7	12/16/20	1	0	36	\$0.14800	8	7	\$0.09800	2	0	\$0.11790
MECO	\$0.12388	\$0.0933	\$0.03058	\$16,211,085	42	24	12/16/20	5	2	36	\$0.10290	18	13	\$0.09330	19	9	\$0.09530
Nantucket	\$0.12388	\$0.1033	\$0.02063		6	4	12/16/20	0	0	36	N/A	5	4	\$0.10325	1	0	\$0.12790
WMECO	\$0.09020	\$0.0880	\$0.00220	\$224,842	39	1	12/16/20	3	0	36	\$0.09990	18	1	\$0.08800	18	0	\$0.09290
Maryland																	
BGE	\$0.07225	\$0.0469	\$0.02535	\$26,574,141	109	35	12/16/20	51	18	36	\$0.04690	6	3	\$0.06500	52	14	\$0.04890
Delmarva MD	\$0.07802	\$0.0539	\$0.02412	\$4,862,231	92	49	12/16/20	49	28	36	\$0.05390	2	2	\$0.07640	41	19	\$0.05400
Potomac Edison	\$0.06858	\$0.0455	\$0.02308	\$4,252,091	81	31	12/16/20	42	17	36	\$0.04550	4	3	\$0.05990	35	11	\$0.04600
Pepco MD	\$0.07865	\$0.0514	\$0.02725	\$11,377,468	98	49	12/16/20	49	26	36	\$0.05140	4	2	\$0.06570	45	21	\$0.05340
Ohio																	
AEP Columbus Southern	\$0.05045	\$0.0340	\$0.01645	\$21,428,660	143	47	12/16/20	72	27	36	\$0.03400	8	4	\$0.03990	63	16	\$0.03600
AEP Ohio Power	\$0.05045	\$0.0340	\$0.01645		143	47	12/16/20	72	27	36	\$0.03400	8	4	\$0.03990	63	16	\$0.03600
Cleveland Electric Illuminating	\$0.04830	\$0.0350	\$0.01330	\$6,003,235	126	36	12/16/20	65	20	48	\$0.03500	7	2	\$0.04690	54	14	\$0.03860
Dayton	\$0.04605	\$0.0370	\$0.00905	\$4,183,331	103	26	12/16/20	53	17	36	\$0.03700	6	2	\$0.04550	44	7	\$0.03850
Duke	\$0.04823	\$0.0372	\$0.01103	\$7,249,097	156	27	12/16/20	76	20	48	\$0.03720	17	0	\$0.04990	63	7	\$0.03780
Ohio Edison	\$0.04781	\$0.0350	\$0.01281	\$10,080,291	126	27	12/16/20	67	16	48	\$0.03500	7	2	\$0.04690	52	9	\$0.03860
Toledo Edison	\$0.04867	\$0.0350	\$0.01367	\$2,969,542	126	35	12/16/20	67	20	48	\$0.03500	7	2	\$0.04690	52	13	\$0.03800
Pennsylvania																	
Duquesne	\$0.07065	\$0.0436	\$0.02706	\$8,200,381	134	50	12/16/20	82	28	36	\$0.04359	5	3	\$0.06100	47	19	\$0.04360
MetEd	\$0.06174	\$0.0356	\$0.02615	\$12,750,859	135	42	12/16/20	92	27	36	\$0.03559	5	3	\$0.05360	38	12	\$0.03560
PECO	\$0.06426	\$0.0450	\$0.01927	\$16,660,532	146	41	12/16/20	88	26	36	\$0.04499	5	2	\$0.06020	53	13	\$0.04500
Penelec PA	\$0.05667	\$0.0385	\$0.01818	\$6,450,630	134	33	12/16/20	87	23	36	\$0.03849	4	3	\$0.04790	43	7	\$0.03900
Penn Power	\$0.06435	\$0.0427	\$0.02165	\$2,511,343	105	32	12/16/20	65	20	36	\$0.04370	4	3	\$0.05790	36	9	\$0.04270
PPL	\$0.07317	\$0.0428	\$0.03038	\$33,161,564	164	75	12/16/20	104	47	36	\$0.04279	7	5	\$0.06400	53	23	\$0.04300
West Penn Power	\$0.05198	\$0.0320	\$0.01999	\$8,705,239	116	32	12/16/20	77	20	36	\$0.03199	5	4	\$0.04490	34	8	\$0.03790

FOOTNOTE

- 1) D.C. PTC analysis compares both the utility PTC rate and supplier offer rates from the previous month. This is due to the Public Service Commission of the District of Columbia typically publishing the offers late and at times without a consistent frequency.
- 2) Massachusetts Variable Price Offers for this analysis are those that automatically renew to a variable price-product since the MA Dept of Public Utilities currently doesn't publish variable offers.

State	REP	Description
Connecticut	Clearview Electric, Inc.	Electric vehicle charger rebate and free weekend EV charging, not to exceed 250 kWhrs per month.
	Connecticut Gas & Electric, Inc.	Monthly dining certificate available.
	Discount Power, Inc.	Monthly shopping/dining certificate.
	Verde Energy USA, Inc.	Cash back program.
	XOOM Energy Connecticut, LLC	Supplier will make a charitable donation based on customer usage.
D.C.	Agera Energy	50% Wind or 100% Wind Nationally sourced
	Clean Currents	50% Wind or 100% Wind offers
	Ethical Electric	100% Wind Power from Regional Source
	IDT Energy	100 Hydroelectric
	Stream Energy	Includes Identity Protection
	Viridian	50% Renewable Energy
	Viridian	100% Wind
	WGL Energy Services, Inc.	5% Wind, 50% Win, or 100% Wind offers
Illinois	American Power & Gas of IL, LLC	Fixed 100% Clean Energy rate plus a 25% rebate on your average monthly supply charges after 12 months. Thereafter customers will receive a competitive variable rate. No monthly fees with 12 months of price certainty.
	CleanChoice Energy, Inc.	Claim your National Parks Pass when you choose 100% wind & solar with CleanChoice Energy. Mention offer NPSPass over the phone or sign up online via the offer link.
	Direct Energy	You'll get a Hive Starter Pack with your order to create the perfect smart home. Hive smart home services help you connect to your home from virtually anywhere.
	Illinois Gas & Electric	A month-to-month variable product, in which upon completion of your 12th billing cycle you will be eligible to receive a 12% rebate on your single highest month's supply charge.
	Just Energy	Sign up and receive up to 5,000 Just Energy Perks Points. Plus receive up to 2,000 more points every 3 months you're with Just Energy. Points are redeemable for Energy Efficient Products, Gift Cards or Visa Prepaid Cards.
	Just Energy	The Illinois Unlimited Plan is a Gas and Electric offer starting from \$109/month with 20% JustGreen included at no extra charge and a possible \$250 rebate. Check Just Energy's website for more information.
	Liberty Power Holdings LLC	Our \$25x2 customer loyalty program is offered to new and existing customers that sign up for or renew onto a fixed-rate plan. You'll receive two \$25 gift cards, one at 3 months and another at 12 months - for a total of \$50!
	NRG Home	100% Wind Energy! Plus, get a Goal Zero Rock Out 2 Solar Speaker after 3 months of service.
	NRG Home	Get \$50 sign up bonus after 6 months of service, and 5% cash back annually.
	NRG Home	plus 1% Cash Back after every 12 months of service. Rate is variable after term expiration. Click Sign Up For This Offer for full details.
Verde Energy USA	New enrollments receive \$100 in Cash-Back Savings, a 10% discount on energy saving products, and free access to Verde Energy Solutions where customers can monitor & analyze their energy use. To enroll visit www.verdeenergy.com .	
Maryland	AEP Energy, Inc.	Includes access to AEP Energy Reward Store, a one-stop online marketplace filled with a variety of energy-saving products for your home and is exclusively for AEP Energy customers. You can earn Reward Dollars to use in the Reward Store by enrolling in this price plan.
	Balance Power Systems, LLC	We charge at the wholesale price +5% and cap first month at SOS. We are non-profit and developing the market for dual fuel appliances and thermal energy storage to enable households to save money while using renewables the instance they generate.

Constellation NewEnergy, Inc.	A 90-day satisfaction guarantee that gives you the ability to cancel your contract during the 90-day period without an early termination fee.
Discount Power, Inc.	Receive \$1200 annually in Discount Power Rewards. Save on shopping, dining, travel, movies, and so much more!
Great American Power, LLC	This plan includes \$50 of Shopping Rewards per Month. This product is 100% GREEN.
IDT Energy, Inc.	Take advantage of cash-back rebates and offers on the energy you consume. Enroll and register to earn Rewards on the energy you consume. Redeem points for branded merchandise and retailer gift cards. Visit www.IDTEnergy.com .
Liberty Power Maryland, LLC	Our customer loyalty program is offered to new and existing customers that sign up for or renew onto a fixed rate plan. You'll receive two \$25 gift cards, one at 3 months and another at 12 months, for a total of \$50!
Reliant Energy Northeast LLC d/b/a NRG Home	The NRG Home Online Exclusive Plan includes: 3-month or 6-month promotional supply price, 1% Cash Back after every 12 months of active service with us. See Important Offer Details at nrghomepower.com/md6781
SFE Energy Maryland Inc d/b/a SFE Energy or SFE	SFE will plant 1 tree on your behalf. Introductory rate for first 2 months of 0.0971c/kWh. You may receive up to \$75 cash back if you don't save money over the course of your term.
SFE Energy Maryland Inc d/b/a SFE Energy or SFE	You may receive up to \$50 cash back if you don't save money over the course of your term.
Spark Energy, LP	Prepare and protect 12:Lock in a low rate for 12 months -- and get a LuminAID solar lantern that can get you through almost any storm. Plus, we'll donate a lantern in your name to an area in need. A cancellation fee of \$100 applies.
Spring Energy RRH LLC d/b/a Spring Power & Gas	Customers can select either 5% Ecogold Rewards to redeem for gift cards and movie tickets or 3% Cash Back. Rewards are calculated based on Spring's supply charges.
Starion Energy PA, Inc.	A cancellation fee of \$100 applies if you cancel Starion Energy during the fixed rate initial term. Active customers can also enroll in Starion Rewards, our free loyalty rewards program. Visit our website for more information.
XOOM Energy Maryland, LLC	Enroll on RescueLock 12 and 5% of your monthly energy charges will be donated to PetSmart Charities!
Massachusetts	
CleanChoice Energy	Rewards Programs, Sponsored Promotions, Claim your National Park Pass to visit over 200 sites in America
Direct Energy Services	Amazon Echo Dot at no cost
Discount Power	Receive \$1200 annually in Discount Power Rewards. Save on shopping, dining, travel, movies, and so much more!
Just Energy Massachusetts	You'll receive 16,000 Just Energy Perks points equivalent to \$160 and 2 FREE LED bulbs.
Liberty Power	Sign up or renew a fixed rate plan and receive a \$25 gift card at 3 months and another at 12 months. Total \$50.
Renaissance Power & Gas, Inc.	Carbon Offset, Charitable Contributions
SFE Energy Massachusetts	Carbon Offset, Cash Back, Eligible for \$75 rebate if you don't save money over course of term
Starion Energy, Inc.	\$25 Amazon gift card
Union Atlantic Electricity	2% Annual Cash Back, \$25 Monthly shopping and dining rewards
Verde Energy USA	Energy Efficiency Services, Cash Back
Ohio	
AEP Energy Inc	You can earn Reward Dollars to use in the Reward Store by enrolling in this price plan.
Alpha Gas And Electric LLC	50% Cash Back on Alpha supply portion of customer's bill of choice after six months of Alpha supply service
American Power & Gas of Ohio LLC	Our 25% rebate check is available to all of our customers. Plus: Travel Savings Deal Dollars Movie downloads Reforestation projects 1yr magazine subscription Pick yours! We have sent out over \$900 000 in rebates. Are you getting one?
Energy Plus Holdings LLC	Earn a \$50 Enrollment Bonus after two months of electric service with Energy Plus and 3% Cash Back every year on the supply portion of your electric bills.
Energy Service Providers Inc	Customers will be eligible for a 12% rebate off of their highest monthly supply charge following the first 12 months of service.
Great American Power LLC	**SHOPPING REWARD DOLLARS** \$500 when you start service for first month and \$100 every month remaining in the contract.
Hiko Energy LLC	ONE FREE MONTH OF ENERGY SUPPLY after 12 consecutive months of service with HIKO - see welcome packet for details.

IGS Energy	Earn 5¢/gal in Fuel Rewards Savings for every \$50 you spend with IGS Energy on your utility bill.
Just Energy	If you successfully enroll in the Just Energy Natural Gas or Electricity plan from another energy retailer we will reimburse any exit fees that your previous retailer charges you to a maximum of \$50 per commodity.
Just Energy	Sign up and receive 2 Free LED bulbs and up to 5 000 Just Energy Perks Points. Plus receive up to 2 000 more points every 3 months you're with Just Energy. Points are redeemable for Energy Efficient Products Gift Cards or Visa Prepaid Cards.
Liberty Power Holdings LLC	Our customer loyalty program is offered to new and existing customers that sign up for or renew onto a fixed-rate plan. You'll receive two \$25 gift cards one at 3 months and another at 12 months - for a total of \$50!
NRG Home	100% Wind Energy and a Goal Zero Rock Out 2 Solar Speaker after 3 months
SmartEnergy Holdings LLC	6 month fixed with a \$50 Cash Back Bonus
Residents Energy LLC	Earn 5% cash-back in the form of a rebate every 6 months. Plus get a \$25 Awards2GoVISA® gift card after the 3rd bill cycle.
XOOM Energy Ohio LLC	Get the peace of mind you deserve with our RescueLock 12 fixed rate plan! Enroll on RescueLock 12 and 5% of your monthly energy charges will be donated to PetSmart Charities!*
Pennsylvania	
AEP Energy	Enjoy a year of Amazon Prime, a \$99 value, on us when you enroll your home on our energy supply. Already a Prime member? Extend your existing membership for one year with this offer. This offer is for new customers only and subject to availability.
Agway Energy Services LLC	Promotional rate for the 1st bill to introduce you to our EnergyGuard repair program. This valuable coverage is included with our commodity supply and provides Peace of Mind repair protection on your central a/c unit and electric lines in your home.
Ambit Energy	Ambit Green Keystone Variable: This plan is eligible for free energy and travel rewards.
American Power & Gas of Pennsylvania LLC	Our famous 25% rebate check is available to all of our customers. Plus: Travel Savings, Deal Dollars, Movie downloads, Reforestation projects, 1yr magazine subscription Pick yours! We have sent out over \$900,000 in rebates. Are you getting one?
CleanChoice Energy	Switch to 100% clean energy with CleanChoice Energy today and claim your promotional National Park Pass when you use the offer NPSPass over the phone at 1-800-460-4900. Now when you support 100% clean renewable energy with CleanChoice Energy not only will you get a National Park Pass to be able to visit more than 2,000 sites across America, but also with your new clean energy plan you'll help keep those sites beautiful for future generations.
Discount Power Inc.	*New customers only ** Receive \$1200 annually in Discount Power Rewards. Save on shopping, dining, travel, movies, and so much more
Great American Power	***SHOPPING REWARDS PROGRAM*** \$500 SHOPPING DOLLARS + \$100 SHOPPING DOLLARS EVERY MONTH By selecting this plan, you will have exclusive access to our Shopping Rewards Program. We would love to welcome you to our program and enjoy these special features and benefits. This is a fixed plan for 18 Months at \$0.0619 with an Early Termination Fee is \$10 per month remaining in the contract and will not exceed \$100. ***For New Customers Only*** To enroll, on line go to www.greatamericanpower.com or call 1-877-215-4140. Note: The monthly fee is calculated at \$.50 per day and will change based on the number of days in the billing cycle.
IDT Energy, Inc.	Our 12-month fixed supply rate. NO termination fees, rate spikes, or enrollment fee. Gain the security of a fixed rate with the flexibility of a variable program. Earn REWARD points for every kWh used and redeem them for gift cards and more.
Liberty Power	Our \$25x2 customer loyalty program is offered to new and existing customers that sign up for or renew onto a fixed-rate plan. After 3 months with Liberty Power, you are eligible to redeem a \$25 gift card. After your 12 month anniversary, you are eligible to redeem another \$25 gift card - for a total of \$50! It's our way of saying Happy Anniversary!

NRG Home	This plan benefits the Children's Hospital of Philadelphia (CHOP). It includes a 12-month fixed price, \$50 contribution to CHOP after one month of service, and a 1% ongoing, annual contribution. Click "Sign Up For This Offer" for full details.
Palmco Power PA, LLC	Web Exclusive Fixed Plan: 13 month fixed term contract. Rate of 0.07500 for the initial 1 month of service, followed by a fixed rate of 0.0818 for the remaining 12 months. No cancellation fees. Promotions available (restrictions apply): Dinner & Movie Gift Cards Restaurant.com Gift Cards Referral Credits
SFE Energy	SFE will plant 1 tree on your behalf. You may receive up to \$50 cash back if you don't save money over the course of your Agreement's term.
SFE Energy	You may receive up to \$75 cash back if you donate save money over the course of your Agreement's term.
Shiple Energy	Earn 3% cash back with Shipley's PowerPerks rewards program! New Customer Rate.
Shiple Energy	Get the protection you want with our Fixed Rate Offer! Click "View Offers" above to sign up today! Plus earn 3% cash back with Shipley's PowerPerks rewards program! For New Customers Only.
SmartEnergy	\$50 rebate after 3 months
Verde Energy USA, Inc.	New enrollments receive \$100 in Cash-Back Savings, a 10% discount on energy saving products, and free access to Verde Energy Solutions where customers can monitor and analyze their energy use.

State	Utility	Rate Schedule	Number of Residential Customers	Utility Load Profile Assigned	Monthly kWh by Profile	Total Monthly kWh	Sources	Notes
Connecticut	Eversource - CL&P	Residential - Rate 1	1,141,723	RNSH: Residential Non-Space Heat (01)	741	845,715,723	Rate Schedule: Utility Tariff Offers taken from Connecticut Rate Board: www.energizect.com Number of CL&P Residential Customers: FERC Form1 2019 Q4	1) # of Fixed and Green Offers excludes offers not available until the following month 2) Green Offers not included in Fixed offer analysis 3) Green Offers defined as those with green provisions exceeding the state minimum 4) Total Monthly kWh = Number of Residential Customers x Monthly kWh by Profile 5) Offers containing enrollment fees are not included in this analysis 6) Offers containing monthly service fees are not included in this analysis. A few offers now have hidden monthly pass through fees for capacity.
	United Illuminating	Residential - Rate R	304,670	R: Residential	438	133,474,329	Number of UI Residential Customers: FERC Form1 2019 Q4	
D.C. (1)	Pepco	Residential - Schedule R	194,020	RDNS: Residential Non-Space Heating (DC)		80,037,921	Rate Schedule: Utility Tariff Offers: D.C. PSC - History of Electric Gen & Trans Prices https://www.dcpsc.org/Utility-Information/Electric/Historical-and-Analytical-Information-for-Electric/Consumer-Advisory-Electricity-Prices.aspx Pepco's Average Number of Residential Customers and Total Monthly kWh: https://www.dcpsc.org/Utility-Information-for-Electric/Rates-and-Number-of-Customers.aspx	1) D.C. PTC analysis is on a 1 month lag due to the P.S.C. typically publishing the offers late and without a consistent frequency. 2) Green Offers not included in Fixed and Variable offer analysis 3) Green Offers defined as those with green provisions exceeding the state minimum
Illinois	Ameren_IL Zone I	BGS-1 - Residential Service	322,537	RESDDL: High summer use; Low winter use		330,811,817	Rate Schedule: Utility Tariff	1) Green Offers, defined as those with green provisions exceeding the state minimum, are not included in Fixed and Variable offer analysis 2) Offers were not considered green in cases where green is mentioned in the offer description but there are no details of what percentage is green 3) Offers showing "Custom Price" as the rate, with no actual value, are not included as part of the analysis 4) Offers containing Monthly fees assessed by the retail suppliers, primarily in ComEd territory, are not included as part of the analysis
	Ameren_IL Zone II	BGS-1 - Residential Service	189,331	RESDDL: High summer use; Low winter use		170,300,599	Offers taken from Plug In Illinois website: www.pluginillinois.org	
	Ameren_IL Zone III	BGS-1 - Residential Service	546,140	RESDDL: High summer use; Low winter use		468,894,588	Source for Number of Residential Customers and Total Monthly kWh: https://www.icc.illinois.gov/Electricity/SwitchingStatistics.aspx	
	ComEd	Residential	3,623,186	23: Residential Single Family Without Electric Space Heat		2,226,309,500		
Massachusetts	NSTAR BECO	Rate A1		R1: Rate R1 Residential			Rate Schedule: Utility Tariff	1) Green Offers not included in Fixed and Variable offer analysis 2) Green Offers defined as those with green provisions exceeding the state minimum 3) Available Number of Residential Customers and Total Monthly kWh for NSTAR not broken out by utility within the state so state totals for all of NSTAR used 4) Available Number of Residential Customers and Total Monthly kWh for NGRID not broken out by utility within the state so state totals for all of NGRID used 5) Variable offers are those that automatically renew to a variable product
	NSTAR CAMB	Rate A1	961,816	R1: Rate R1 Residential		498,793,848	Offers taken from Energy Switch MA: http://energyswitchma.gov	
	NSTAR COMM	Rate A1		R1: Rate R1 Residential			Source for Number of Residential Customers and Total Monthly kWh: https://www.mass.gov/service-details/electric-customer-migration-data	
	FGE	Residential - RD-1	21,773	RD1: Residential RD1		12,928,308		
	MECO	Rate R1	1,045,539	R1: Residential - Non-Space Heat		633,121,867		
	Nantucket	Rate R1		R1: Rate R1 Residential Regular				
	WMECO	Residential Electric (Non-heating)	154,065	R1: Rate R1 Residential Regular		102,200,935		
Maryland	BGE	Schedule R	1,177,333	R: Residential Service	890	1,048,289,567	Rate Schedule: Utility Tariff	1) Green Offers not included in Fixed and Variable offer analysis 2) Green Offers defined as those with green provisions exceeding the state minimum 3) Total Monthly kWh = Number of Residential Customers x Monthly kWh by Profile
	Delmarva MD	Service Classification - R	180,008	MDDRS: Maryland - Residential Service	1,120	201,554,958	Offers taken from Maryland PSC: https://www.mdelectricchoice.com/shop	
	Potomac Edison	Schedule R	240,412	RSNH: Residential Service - No Electric Heat	766	184,232,715	Source for Number of Residential Customers: http://www.psc.state.md.us/electricity/electric-choice-monthly-enrollment-reports/#	

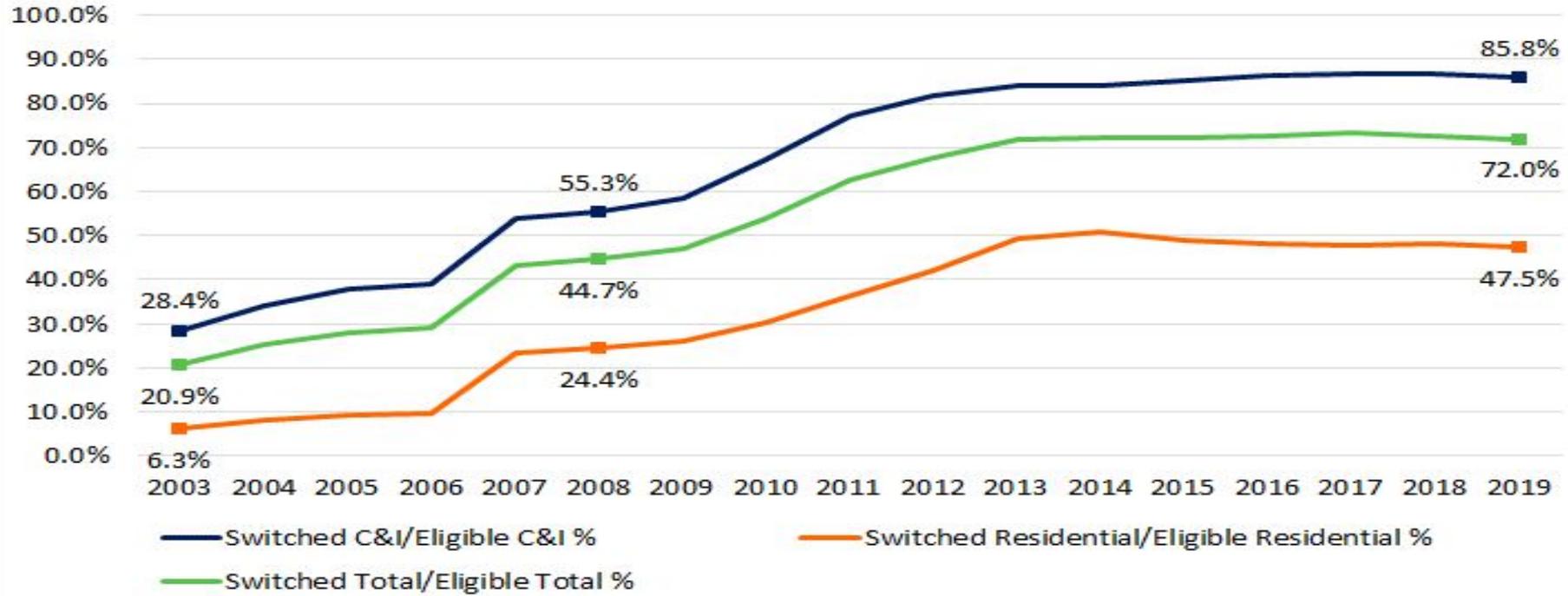
	Pepco MD	Schedule R	532,717	RMNS: Residential Non-Space Heating (MD)	784	417,521,743		4) Offers classified by PSC as Variable with Term listed as 'Varies' are assumed to have a term of 1 month
OH	AEP Columbus Southern	Schedule RS	1,301,577	CSRESA: Residential		1,302,860,000	Rate Schedule: Utility Tariff	<p>1) Green Offers not included in Fixed and Variable offer analysis</p> <p>2) Green Offers defined as those with green provisions exceeding the state minimum</p> <p>3) Offers, Available Number of Residential Customers and Total Monthly kWh for AEP not broken out by utility within the state so state totals for all of AEP used</p> <p>4) Total Monthly kWh derived by multiplying monthly listed MWh by 1,000</p> <p>5) Offers containing a monthly service fee are not included in this analysis</p>
	AEP Ohio Power	Schedule RS		OPRESA: Residential			Offers taken from PUC: www.energychoice.ohio.gov	
	Cleveland Electric Illuminating	Residential	668,637	RG: Residential-General		451,405,000	Source for Number of Residential Customers and Total Monthly kWh: https://app.powerbigov.us/view?r=eyJrjoiZTIzDEzNGETzjlhY00YWwEzLThjZjktMGZmNDg4OWE4ZDFkIiwidCI6IjUwZjhmY2M0LTk0ZDgtNGYwNy04NGVlLTM2ZWQ1N2M3YzhmIiw9	
	Dayton	Residential	465,770	RS00: Residential No Heat Default		462,410,000		
	Duke	Residential	647,602	RS0: Residential - Unknown Winter Load		657,268,000		
	Ohio Edison	Residential	938,455	RG: Residential-General		786,908,000		
	Toledo Edison	Residential	275,123	RG: Residential-General		217,167,000		
Pennsylvania	Duquesne	Rate Schedule RS	537,663	RS: Residential Service	303,022,003	303,022,003	Rate Schedule: Utility Tariff	<p>1) # of Fixed, Variable, and Green Offers for this analysis excludes any offers containing Enrollment Fees, Monthly Service Fees, Daily Service Fees, or are not available until the following month</p> <p>2) Green Offers not included in Fixed and Variable offer analysis</p> <p>3) Green Offers defined as those with green provisions exceeding the state minimum</p> <p>4) GRT embedded in Utility PTC rate and retail offers</p> <p>5) Total Monthly kWh for DQE = Monthly kWh by Profile</p> <p>6) Total Monthly kWh for all other utilities = Number of Residential Customers x Monthly kWh by Profile</p> <p>7) Offers classified by PUC as Variable with Term listed as 'No term length' are assumed to have a term of 1 month</p>
	MetEd	Rate RS	522,640	RSNH: Residential Service - No Electric Heat	933	487,604,539	Offers taken from PA Power Switch www.papowerswitch.com/	
	PECO	Rate R	1,490,585	R112: Residential - Average Monthly 451-800 kWh	580	864,583,930	Source for Number of Residential Customers: http://www.oca.state.pa.us/Industry/Electric/electstats/ElectricStats.htm	
	Penelec PA	Rate RS	499,855	RSNH: Residential Service - No Electric Heat	710	354,820,140		
	Penn Power	Rate RS	145,584	RG: Residential-General	797	115,997,368		
	PPL	Schedule RS	1,258,736	RS-GRS: RESIDENTIAL SERVICE - NON-ELEC HEAT	867	1,091,559,040		
	West Penn Power	Rate RS	622,082	RSNH: Residential Service - No Electric Heat	700	435,479,681		

Percentage of Load Switched in the 14 Competitive Jurisdictions

DPUC 1-6
Attach. B

The great majority of eligible load in the choice jurisdictions is served by competitive suppliers

Source: DNV GL 2019 Retail Energy Outlook



The information presented in this document represent the views of RESA as an organization and may not necessarily reflect the views of any particular RESA member.

Figure 6 (page 16) of Restructuring Recharged – Updated through CY2019

Source: DNV GL 2019 Retail Energy Outlook. This figure is derived from data obtained from information from the annual report on competitive electricity accounts and loads issued by DNV GL. DNV GL, is a highly regarded international consulting and energy information firm that compiles information from state utility commissions and other sources to estimate a variety of statistics on retail electricity choice provided to subscribers in an annual Retail Energy Outlook Report.

This figure shows the upward trend in shopping activity from both residential and C&I customers with respect to load served by non-utility suppliers.^{*1} In 2019, 72.0% of load eligible to switch in the 14 customer choice markets was served competitively with retail pricing and products by non-utility suppliers. It is interesting to observe that the vast majority of C&I load (85.8%) has switched to non-utility supply. Meanwhile, about half (47.5%) of the residential load in the competitive jurisdictions had switched to supply procured by retail suppliers. Most of the remaining load in the 14 markets, a little less than one-third of total eligible load in those jurisdictions, is served with market-priced supply procured in the competitive wholesale market by wires utilities acting as default providers.

The nature of utility default service is often misunderstood or mischaracterized as the equivalent of traditional utility “rate of return” tariffed service under the monopoly model that the utility provided prior to restructuring. It is significantly different in several ways:

- Wires-only utilities that provide default service to non-choosing residential and small business customers generally do not earn a profit from providing the market-priced default supply;
- Customers eligible for default service are generally free to switch from the utility default service and to choose service from a competitive supplier; and,
- Default service supply is customarily procured through forward purchases made in a competitive wholesale market in a similar manner as that procured by the retail suppliers.

*1: The word “eligible” in the slide title is meant to indicate that only those customers allowed to choose a retail supplier (usually those located behind IOUs in the competitive jurisdictions/states) are included in the calculation. Typically, customers located behind municipal utilities and rural cooperatives do not allow choice in